

ken
Clariant Corporation

AUG 25 2004

4000 Monroe Road
Charlotte, NC 28205
704.331.7000



Erin Russell
Writer's Direct Dial No.: 704/331-7059
Fax No.: 704/331-7131
E-Mail: erin.russell@clariant.com

COMPANY SANITIZED
DOES NOT CONTAIN TSCA CBI

August 20, 2004

Thomas T. Olivier
Senior Enforcement Counsel
EPA New England, Region 1
1 Congress Street, Suite 1100 (SEL)
Boston MA 02114-2023

Re: Clariant Corporation
Request for return of pigment
[REDACTED]

Dear Mr. Olivier:

Please find attached a spreadsheet with information on the shipments to [REDACTED]. I have included information that groups the inventory by shipment in the last column. Based on our delivery records it appears that the product can be grouped into four shipments. I have highlighted in yellow the current inventory [REDACTED]. The inventory exists as either dry powder or presscake.

Clariant is claiming as Confidential Business Information [REDACTED]. I have redacted the spreadsheets accordingly.

I hope this information is responsive to your request. Please let me know if you have any questions regarding this submittal.

Sincerely,

A handwritten signature in black ink that reads "Erin Russell".

Erin Russell

c: Mike Teague
John Paul

Clariant Red Pigment xxxxxxx				
Product	batch number	PCB (PPM)	Delivery #	
Red 214	US62313811	493	xxxxxxx 4800 pounds dry basis	
Red 214	US62313813	296		
Red 214	US62313814	532		
Red 214	62313816	694	xxxxxxx 12691 pounds dry basis	
Red 214	62313817	249		
Red 214	USEA000221	171		
Red 214	USEA000222	382		
Red 214	USEA000223	183		
Red 214	USEA000372	180		
Red 214	USEA000373	246		
Red 214	USEA000374	304		
Red 214	USEA000375	229		
Red 214	US62253712	255		
Total Red 214				
Red 144	US62254103	606	xxxxxxx 4990 pounds dry basis	
Red 144	US62313707	590		
Red 144	USEA000232	240		
Red 144	USEA000233	501	xxxxxxx 5956 pounds dry basis	
Red 144	USEA000234	475		
Red 144	USEA000235	101		
Red 144	USEA000238	100		
Red 144	USEA000239	35		
Red 144	USEA000240	99		
Total Red 144				
Yellow cells show current inventory				

COMPANY SANITIZED
DOES NOT CONTAIN CBI

From: Origin ID: (704)331-7206
Janel Tornell
CLARIANT CORPORATION
4000 MONROE ROAD

CHARLOTTE, NC 28205



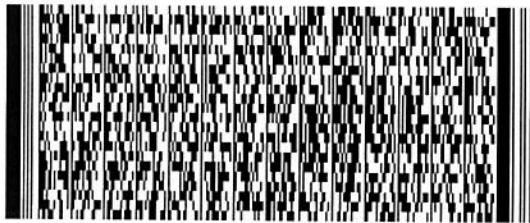
Ship Date: 31MAR05
Actual Wgt: 1 LB
System#: 5645486/INET2000
Account#: S *****

REF: 1501



Delivery Address Bar Code

SHIP TO (617)918-1527 BILL SENDER
Kimberly Tisa, PCB Coord.(CPT)
USEPA
1 Congress Street
Suite 1100
Boston, MA 021142023



STANDARD OVERNIGHT

FRI

Deliver By:
01APR05

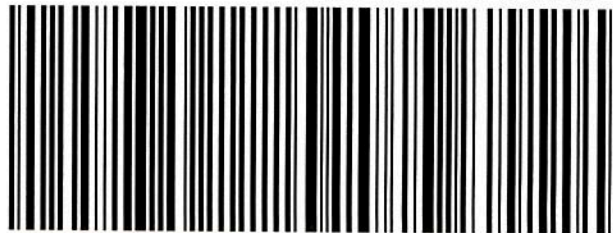
TRK# 7915 8808 9169

FORM
0201

BOS A1

02114 -MA-US

XH LWMA



Shipping Label: Your shipment is complete

1. Use the 'Print' feature from your browser to send this page to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

From: Origin ID: (704)331-7206
Janet Tornell
CLARIANT CORPORATION
4000 MONROE ROAD

CHARLOTTE, NC 28205



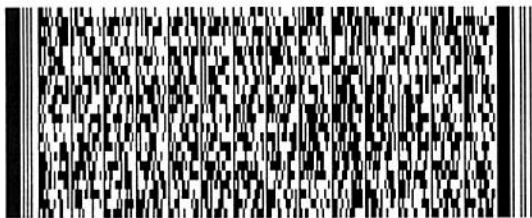
Ship Date: 15APR05
Actual Wgt: 1 LB
System#: 5645486/INET2000
Account#: S *****

REF: 1501



Delivery Address Bar Code

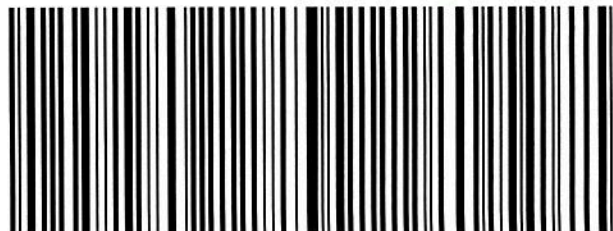
SHIP TO: (617)918-1527 BILL SENDER
Kimberly Tisa, PCB Coord.(CPT)
USEPA
1 Congress Street
Suite 1100
Boston, MA 021142023

**STANDARD OVERNIGHT****MON**Deliver By:
18APR05

TRK# 7916 0101 6359

FORM
0201**BOS** A1

02114 -MA-US

XH LWMA

Shipping Label: Your shipment is complete

1. Use the 'Print' feature from your browser to send this page to your laser or inkjet printer.
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**Facsimile Transmission
Cover Sheet**



Clariant

Erin Russell
Clariant Corporation
4000 Monroe Road
Charlotte NC 28205
Tel: 704/331-7059
Fax: 704/331-7131
erin.russell@clariant.com

To: Ms. Deborah Brown
Firm: EPA Region 1
Fax No.: 617 918 0706
Phone: 617 918 1706

From: Erin Russell
Date: September 30, 2003

Subject: Correspondence Attached

Number of pages, including cover: 5

CONFIDENTIALITY NOTE: The information contained in this telecopy is being transmitted to and is intended for the use of the individual named above. If the reader of this message is not the intended recipient, you are hereby advised that any

received this facsimile in error, please immediately notify us by telephone and destroy this telecopy:

Clariant Corporation

4000 Monroe Road
Charlotte, NC 28205
704.331.7000Erin Russell
Writer's Direct Dial No.: 704/331-7059
Fax No.: 704/331-7131
E-Mail: erin.russell@clariant.com

September 30, 2003

Ms. Deborah Brown
Chief of Toxics Pesticides and Federal Programs
EPA New England, Region 1
1 Congress Street, Suite 1100
Boston MA 02114-2023

Re: Clariant Corporation

Dear Ms. Brown:

Pursuant to our conversation earlier today, I am attaching a copy of the correspondence sent to Ms. Geraldine Gardner at EPA Headquarters concerning the discovery of elevated levels of PCBs in two pigment products manufactured at a Clariant facility in Coventry, Rhode Island. This should provide some background on our discovery of the issue and our initial actions in response. As we continue our response efforts we are coming across issues for which we need regulatory assistance. As I mentioned on the phone, we would like to arrange for a meeting with the appropriate Region 1 staff members to discuss the general situation, the response actions that we have undertaken and the issues we foresee with regard to the remaining activities addressing this issue. We have had some preliminary guidance from Peggy Reynolds at EPA Headquarters, however she suggested that Region 1 could take the lead in assisting us.

In general some issues we foresee that we will need to address are in the following areas: evaluating TRI and Tier II reporting, management of in-process product, reprocessing existing product that was not placed in commerce, and disposal issues. Of these issues the question of management of the product at various stages of production is of particular significance. This is an instance in which it does not appear that the regulations directly address some questions we have. For that reason we are hesitant to make an independent determination on how the regulations are interpreted in our circumstance. I am also sending by email to you copies of the email correspondence that addressed some of these issues in a preliminary way with Ms. Reynolds.

Over the next two weeks we are flexible in our availability to meet with you. I look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script that reads "Erin Russell".

Erin Russell

c: Mike Teague



September 23, 2003

VIA FAX AND US MAIL

Geraldine Gardner
USEPA Headquarters
Ariel Rios Building 2245A
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460

Re: Clariant Corporation
Telephone Contact Confirmation
Coventry Facility
500 Washington Street
Coventry, Rhode Island 02816

Dear Ms. Gardner:

I am writing as a follow up to my message yesterday and our phone conversation earlier today. As we discussed, Clariant has provided information concerning elevated levels of PCBs found in two pigment products. These products were manufactured at Clariant's Coventry facility in Coventry, Rhode Island and shipped to customers in a number of EPA regions.

This information was disclosed pursuant to the EPA Self-Audit Policy. Clariant meets the nine elements of the policy as follows:

1. The discovery of non-compliance was found as part of a compliance management system. A recently initiated global program augmenting our corporate audit system in the United States called for testing of the pigment products from our Coventry facility. It was through this process that elevated levels of PCBs were discovered.
2. The discovery was not made through a legally mandated monitoring or sampling program. Again, it was through a self-initiated voluntary program.
3. Clariant's disclosure, initially made on September 22, 2003, was made within 21 days of discovery.
4. The discovery and disclosure are made independent of a government or third-party action.
5. Clariant stopped producing the two products at issue. These product lines will not be resumed until they can produce pigments in compliance with the TSCA regulations. Clariant will provide necessary certifications under the audit

Ms. Geraldine Gardner
September 23, 2003
Page 2



6. Clariant will agree to take steps to prevent any recurrence of the violation. Clariant has already begun planning for a new program to augment existing programs and ensure compliance.
7. Clariant has had no PCB related violations at the Coventry facility.
8. Potential violations stemming from the activities described herein are not excluded from the audit policy.
9. Clariant will cooperate with the EPA in providing the information necessary to determine the applicability of the audit policy.

Clariant produces pigments in an excluded manufacturing process under TSCA. Clariant has historically tested the pigment intermediate for PCBs after the first step of the two-step manufacturing process. The intermediate has been consistently well below 50 ppm. Based on our lab testing and research it was not expected that PCBs would be generated in the second step of the manufacturing process. However, through a newly initiated program the end product underwent a series of analyses. PCBs were found at levels exceeding 50ppm. The presence of the PCBs at these levels was unexpected. We are researching the possible cause.

Clariant suspended manufacturing and shipment of the pigments. We are in the process of conducting meetings with our employees to inform them of the situation. Further, Clariant engaged outside occupational exposure and occupational medical experts to conduct a preliminary exposure assessment at the Coventry site, as well as at a sister division's manufacturing site where the pigments are used to make plastics colorants. Preliminary results show that employee exposure is negligible. This is due in part to the level of closure in the manufacturing process and to the PPE worn by workers on this process.

We have confirmed that there were no releases to water (via analytical from 2001, 2002, 2003) or to air (through calculations using EPA models). We do have material on site and are managing it for storage and disposal according to TSCA regulations. In storage there is no threat of spill.

We have implemented a communications plan that includes employees, customers and governmental officials. We are contacting our customers of this material with instructions not to use the product, and we are following up with storage instructions. Clariant will provide a hazardous waste contractor to go to the customer's sites, properly package the material and remove it for appropriate disposal.

Ms. Geraldine Gardner
September 23, 2003
Page 3



In addition, Clariant is thoroughly reviewing the process for making the pigments to determine the likely source of the PCBs and how to eliminate it.

I am the Clariant contact for any questions related to this matter. My contact information is: Erin Russell, Clariant Corporation, 4000 Monroe Road, Charlotte, NC 28205. Telephone 704-331-7059; Fax 704-331-7131. I will be glad to provide further information or arrange to meet with EPA staff regarding this matter.

Sincerely,

A handwritten signature in cursive script that reads "Erin Russell".

Erin Russell

c: Chris Barnard
Mike Teague

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF POLLUTION PREVENTION AND TOXICS
WASHINGTON, DC 20460

PLEASE PRINT IN BLACK INK ONLY

TO:

Kim Tisa

OFFICE PHONE:

DATE:

9/25/03

ORGANIZATION:

FROM: FIBERS & ORGANICS BRANCH

Mail Code 7404T

/ / TONY BANEY	566-0497	/ / SARA MCGURK	566-0480
/ / SHEILA CANAVAN	566-1978	/ / PEGGY REYNOLDS	566-0513
/ / LAURA CASEY	566-1982	/ / TOM SIMONS	566-0517
/ / ROBERT COURTAGE	566-1081	/ / JOHN SMITH	566-0512
/ / SELWYN COX	566-0496	/ / LINDA STRAUSS	566-1973
/ / HIROSHI DODOHARA	566-0507	/ / JACK PRIMACK	566-0499
/ / DAVID HANNEMANN	566-0508	/ / VALERIE YORK	566-0497
/ / PETER GIMLIN	566-0515		
/ / WINSTON LUE	566-0511		

Facsimile Number
202-566-0473

Verification Number
202-566-0497

Notes:

Forwarded for my e-mail.

PLEASE NUMBER EACH PAGE

Page 1 of 5

**Facsimile Transmission
Cover Sheet**

Erin Russell
Clariant Corporation
4000 Monroe Road
Charlotte NC 28205
Tel: 704/331-7059
Fax: 704/331-7131
erin.russell@clariant.com

To: Peggy Reynolds
Firm: US EPA
Fax No.: 202-566-0473
Phone: 202-566-0513

From: Erin Russell
Date: September 23, 2003

Subject: Correspondence Attached

Number of pages, including cover: 4

I am still looking into the time of the FDA meeting on 9/29. It should be no earlier than 1pm. I'll try to have an answer to that in the morning. Attached is our notification letter sent earlier to Ms. Gardner. The information I have been able to find at this time is that the Clariant facilities using the pigment product (that is made in Rhode Island) are located in Delaware, Michigan, Minnesota, Illinois and Georgia. I hope this provides a good starting point for information.

CONFIDENTIALITY NOTE: The information contained in this telecopy is being transmitted to and is intended for the use of the individual named above. If the reader of this message is not the intended recipient, you are hereby advised that any dissemination, distribution or copy of this telecopy is strictly prohibited. If you have received this facsimile in error, please immediately notify us by telephone and destroy this telecopy.



September 23, 2003

VIA FAX AND US MAIL

Geraldine Gardner
USEPA Headquarters
Ariel Rios Building 2245A
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460

Re: Clariant Corporation
Telephone Contact Confirmation
Coventry Facility
500 Washington Street
Coventry, Rhode Island 02816

Dear Ms. Gardner:

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Ms. Geraldine Gardner
September 23, 2003
Page 2



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Ms. Geraldine Gardner
September 23, 2003
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Erin Russell

c: Chris Barnard
Mike Teague



ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF REGULATORY ENFORCEMENT
TOXICS AND PESTICIDES ENFORCEMENT DIVISION

Fax Sheet

Fax No. (202) 564 0035

Confirmation No. (202) 564-4032

To: Marianne Milette/Kim Tisa

Fax Number: 617-918-0527

From: Geraldine Gardner

Office Number: 202-564-4032

Number of Pages (including cover sheet): 4

Comments: _____

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September 23, 2003

VIA FAX AND US MAIL

Geraldine Gardner
USEPA Headquarters
Ariel Rios Building 2245A
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Sincerely,

A handwritten signature in cursive script that reads "Erin Russell".

Erin Russell

c: Chris Barnard
Mike Teague



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

BY CERTIFIED MAIL - RETURN RECEIPT REQUESTED

IN THE MATTER OF:

)
) **TOXIC SUBSTANCES CONTROL ACT**
) **SUBPOENA**
)

General Color
Bridge Street
Minerva, OH 44657

)
)
)
)

Attn: Earl Breeze, Technical Manager

Re: Red Pigments (PV Fast Red 3B and PV Fast Red BNP) Purchased from Clariant of Coventry, Rhode Island

By this subpoena, EPA is requiring you to submit information concerning Red Pigments (PV Fast Red 3B and PV Fast Red BNP) you received from Clariant Corporation of Coventry, Rhode Island ("Clariant"), that may have contained PCBs. Section 11(c) of TSCA, 15 U.S.C. § 2610(c), authorizes EPA to issue subpoenas requiring the submission of information on chemical substances such as PCBs.

Unless otherwise stated in any of the following numbered paragraphs, the "Facility" means your facility at Bridge Street, in Minerva, Ohio. Any reference to the "Products" constitutes a reference to the Red Pigments in question. Any reference to a "Facility Product" constitutes a reference to any product your facility manufactures, distributes or sells incorporating the Products. Each of the following information requests covers the shipments of Products made by Clariant on August 30, 2002, October 2, 2002, and February 20, 2003 to your Facility. You are required to provide the following information within thirty (30) calendar days from the date of receipt of this subpoena:

1. If your Facility processes the Products, including but not limited to repackaging, batching or blending, provide a description of the processing. If the processing includes batching or blending of the Products, the description should include the batching and/or blending ratios and any PCB analytical data associated with this processing.
2. For each shipment of Products received or further processed, provide a description of the end use of the Products. The description should include dilution factors and any analytical data collected on PCB concentrations.
3. A list of your customers who received the Products or any Facility Product. For each customer, provide the following information: the customer name, address, point of contact,

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

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phone number, and quantities and dates sold. For any Products or Facility Product sold and recovered from your customers, provide the quantities and dates recovered.

Submit all information required above to the following address:

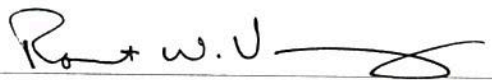
U.S. Environmental Protection Agency
Office of Environmental Stewardship
One Congress Street, Suite 1100 (Mail Code SEP)
Boston, MA 02114-2023
Attention: Marianne Milette, PCB Enforcement Coordinator

Please be aware that if you do not provide the requested information or explain in writing why you cannot provide the requested information in the time allowed, EPA may seek a court order requiring you to comply and may assess monetary penalties under Section 16 of TSCA. Federal law also establishes criminal penalties for falsifying information provided to EPA. If you wish to claim some or all of the information you submit as confidential, you must follow the procedures described in EPA's regulations at 40 C.F.R. Part 2, Subpart B. Any information that is not claimed as confidential may be released to the public under the Freedom of Information Act without further notice to you.

This subpoena is not subject to the Paperwork Reduction Act.

EPA Contacts

For any technical questions regarding this subpoena, you should contact either Marianne Milette at (617) 918-1854 or Kimberly Tisa at (617) 918-1527. For legal matters, have your attorney contact Thomas Olivier, Senior Enforcement Counsel, at (617) 918-1737.



Robert Varney, Regional Administrator
U.S. Environmental Protection Agency
Region I - New England

Date: January 23, 2004

Clariant Corporation

4000 Monroe Road
Charlotte, NC 28205
704.331.7000



Erin Russell
Writer's Direct Dial No.: 704/331-7059
Fax No.: 704/331-7131
E-Mail: erin.russell@clariant.com

June 4, 2004

VIA FEDERAL EXPRESS

Ms. Rose Toscano
Document Control Officer
EPA New England, Region 1
1 Congress Street, Suite 1100
Boston MA 02114-2023

Re: Clariant Corporation Supplemental Information for Mr. Thomas T. Olivier

Dear Ms. Toscano:

Please find one confidential copy and three company sanitized copies of the following document:

1. Correspondence dated June 4, 2004 from Erin Russell to Thomas T. Olivier.

Please feel free to contact me if any further information is needed regarding this submittal.

Sincerely,

A handwritten signature in cursive script that reads "Erin Russell".

Erin Russell

c: Mike Teague
John Paul

Clariant Corporation

4000 Monroe Road
Charlotte, NC 28205
704.331.7000



Erin Russell
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**COMPANY SANITIZED – DOES NOT CONTAIN
CONFIDENTIAL BUSINESS INFORMATION**

June 4, 2004

VIA US MAIL

Thomas T. Olivier
Senior Enforcement Counsel
EPA New England, Region 1
1 Congress Street, Suite 1100 (SEL)
Boston MA 02114-2023

Re: Request for Authorization to Return Pigment Product
[] Mexico to Coventry, RI

Dear Mr. Olivier:

Clariant Corporation ("Clariant") is requesting that the US EPA grant an authorization for Clariant to return contaminated pigment product previously shipped to Mexico back to Clariant's Coventry manufacturing facility. As you know from our ongoing discussions, the Clariant Coventry, Rhode Island facility manufactured a number of batches of red pigment that contained elevated levels of inadvertently generated PCBs. The product was shipped to the [] facility in [], Mexico in the form of a wet press-cake. It is currently stored, primarily still in the press-cake form, pending resolution of its disposition. Several batches are dried and stored as powder pigment product. I have attached a spreadsheet identifying the batches stored in Mexico, the PCB level in each batch and the weight of each batch.

Clariant makes this return authorization request of EPA for several reasons. First, there is no appropriate facility in Mexico to handle disposal of the contaminated pigments. Clariant, and its US waste disposal contractor have thoroughly investigated disposal options in Mexico and have found none. Clariant would like to reprocess the pigments pursuant to and upon approval of the detailed plan submitted by John Paul (Clariant, Coventry RI) to Ms. Kim Tisa. The reprocessing of the pigment product would result in waste minimization due to the resulting segregation and volume reduction of the contaminated portion. Further, it allows for salvage of the useful product. Clariant would dispose of waste from this process in accordance with applicable laws. In the event that reprocessing would not be an option, the PCB contaminated pigment product would be disposed of in accordance with applicable laws.

Clariant would ensure that product was transported in accordance with the regulatory requirements. Please let me know additional information we can provide to assist in your review of this request.

Sincerely,



Erin Russell

Enclosure

c: Mike Teague
John Paul

Clariant Red Pigment - Mexico			
Product	batch number	PCB (PPM)	Updated Inventory KGS.
Red 214	62313816	694	352.0
Red 214	62313817	249	443.5
Red 214	USEA000221	171	552.1
Red 214	USEA000222	382	401.5
Red 214	USEA000223	183	428.2
Red 214	USEA000372	180	446.6
Red 214	USEA000373	246	521.3
Red 214	USEA000374	304	478.8
Red 214	USEA000375	229	457.9
Red 214	US62253712	255	84.3
Red 214	Blend	319	1940.0
Total Red 214			6106.2
Red 144	US62254103	606	227.2
Red 144	US62313707	590	83.2
Red 144	USEA000232	240	674.0
Red 144	USEA000233	501	604.4
Red 144	USEA000234	475	662.4
Red 144	USEA000235	101	608.3
Red 144	USEA000238	100	744.2
Red 144	USEA000239	35	616.4
Red 144	USEA000240	99	760.3
Total Red 144			4980.4
Red 214 blend	MXSC313502	415	27.0
Total in Mexico			11113.6

CLARIANT PA DIVISION CUSTOMERS
THAT PURCHASED
CONTAMINATED RED PIGMENT

COMPANY
SANITIZED
COPY

PA Customer Name	Street	City/State/Zip	Contact Name	Contact Phone
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CLARIANT PA DIVISION CLARIANT PA DIVISION
CUSTOMER SHIPMENT DETAIL

COMPANY SANITIZED COPY

CUSTOMER	SHIP DATE	POUNDS	PCB (ppm)
	08/22/2002	44	34
	09/06/2002	44	76
	10/19/2002	88	116
	10/19/2002	44	116
	12/05/2002	88	116
	01/08/2003	44	116
	01/24/2003	88	108
	03/14/2003	44	596
	03/21/2003	88	596
	03/25/2003	44	389
	04/25/2003	44	660
	05/07/2003	88	660
	05/07/2003	44	660
	05/23/2003	88	660
	06/17/2003	132	666
	08/22/2003	88	455
	06/13/2003	572	386
	06/23/2003	1,320	386
	08/27/2003	440	386
	08/27/2003	880	814
	09/03/2003	880	814
	05/02/2002	110	19
	10/28/2002	220	108
	08/26/2002	440	76
	10/02/2002	440	116
	10/11/2002	660	108
	12/19/2002	1,760	203
	03/25/2003	286	596
	03/25/2003	594	660
	05/01/2003	1,320	660
	05/01/2003	1,320	666
	06/02/2003	1,320	666
	06/28/2003	64	19
	06/28/2003	20	666
	08/21/2003	11	660
	08/21/2003	902	666
	12/11/2001	22	34
	05/02/2002	88	19
	06/05/2002	44	19
	08/06/2002	44	34
	08/13/2002	88	19
	10/19/2002	616	108
	10/23/2002	44	76
	10/23/2002	88	116
	11/14/2002	88	108
	12/10/2002	44	108
	12/30/2002	660	108

CONFIDENTIAL BUSINESS INFORMATION

CLARIANT PA DIVISION CLARIANT PA DIVISION
CUSTOMER SHIPMENT DETAIL

COMPANY SANITIZED COPY

CUSTOMER	SHIP DATE	POUNDS	PCB (ppm)
	01/10/2003	44	116
	01/27/2003	132	34
	01/30/2003	44	34
	01/31/2003	440	116
	02/05/2003	44	116
	02/10/2003	2	389
	02/14/2003	528	389
	02/27/2003	43	34
	02/27/2003	20	389
	02/27/2003	66	596
	03/14/2003	1,694	389
	03/18/2003	88	596
	03/18/2003	44	596
	03/31/2003	198	389
	04/29/2003	44	660
	04/30/2003	1	666
	05/09/2003	132	660
	05/14/2003	88	660
	05/22/2003	88	660
	06/04/2003	3,001	502
	06/19/2003	2	814
	06/19/2003	2	843
	06/19/2003	1,001	843
	06/20/2003	550	389
	06/26/2003	44	660
	07/18/2003	211	502
	07/18/2003	3,518	843
	08/19/2003	1,364	502
	08/19/2003	2,640	427
	05/02/2002	22	19
	10/28/2002	88	108
	11/26/2002	264	203
	03/24/2003	264	596
	07/11/2003	1,056	502
	12/7/2001	1	22
	10/1/2002	270	528
	11/12/2002	537	248
	06/27/2003	237	694
	04/23/2003	10	660
	06/20/2003	11	660
	06/20/2003	33	666
	07/17/2003	3	502
	08/30/2002	44	76
	10/02/2002	44	76
	02/20/2003	44	389
	02/11/2002	176	19
	05/09/2002	176	19

CONFIDENTIAL BUSINESS INFORMATION

CLARIANT PA DIVISION CLARIANT PA DIVISION
CUSTOMER SHIPMENT DETAIL

COMPANY SANTIZED COPY

CUSTOMER	SHIP DATE	POUNDS	PCB (ppm)
	07/25/2002	176	19
	09/04/2002	176	76
	09/13/2002	176	76
	09/19/2002	176	108
	10/02/2002	176	108
	10/22/2002	88	108
	11/07/2002	176	203
	11/20/2002	176	203
	01/07/2003	176	108
	02/10/2003	176	203
	05/03/2002	220	19
	06/10/2002	220	34
	07/24/2002	132	19
	07/26/2002	330	34
	08/19/2002	550	34
	10/24/2002	88	116
	11/08/2002	22	19
	11/08/2002	66	108
	12/11/2002	88	108
	01/08/2003	308	34
	03/13/2003	440	596
	04/23/2003	264	660
	04/25/2003	264	660
	05/13/2003	220	660
	05/22/2003	220	660
	04/23/2003	88	660
	05/30/2003	528	666
	11/20/2001	149	22
	7/30/2002	269	113
	11/7/2002	528	248
	12/5/2001	1,048	22
	5/3/2002	1,049	113
	5/15/2002	1,524	82
	1/20/2003	5	470
	3/21/2003	17	619
	08/19/2003	1,513	116
	08/19/2003	1,480	53
	08/30/2002	2,200	76
	09/30/2002	1,210	76
	09/30/2002	352	116
	10/07/2002	660	116
	10/31/2002	1,188	116
	11/27/2002	660	116
	11/27/2002	330	108
	12/30/2002	1,320	108
	02/28/2003	2,640	557
	02/28/2003	440	389

CONFIDENTIAL BUSINESS INFORMATION

CLARIANT PA DIVISION CLARIANT PA DIVISION CUSTOMER SHIPMENT DETAIL

COMPANY SANTIZED COPY

CUSTOMER	SHIP DATE	POUNDS	PCB (ppm)
	03/31/2003	1,804	700
	03/31/2003	792	596
	04/29/2003	308	700
	04/29/2003	528	596
	05/29/2003	1,320	700
	05/29/2003	88	596
	06/16/2003	484	666
	06/30/2003	88	660
	06/30/2003	220	660
	07/01/2003	616	666
	07/17/2003	6	502
	08/29/2003	1,672	455
	08/29/2003	1,210	415

CLARIANT SECOND-TIER CUSTOMER
AND END USE DATA

COMPANY
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Clariant PA Division Customer Name	2nd Tier Customer Name	Customer Street	Customer City/State/Zip	Contact Name	Contact Telephone	Product Sold	Dates Sold (Quantity Sold)	Weight % Pigment in Product (PCB conc. ppm)	End Use	Weight % Pigment in End Use (PCB conc. ppm)